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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

CIELO JEAN “CJ” GIBSON, EMMA
GLOVER, JULIANNE KLAREN, LINA
POSADA, MELANIE IGLESIAS, SANDRA
VALENCIA, and VIDA GUERRA,

Plaintiffs,

vs.

SHAC, LLC d/b/a SAPPHIRE
GENTLEMEN’S CLUB; SHAC MT. LLC;
EVAN ZAPPOLA d/b/a VEGAS VIP KING

Defendants.

Case No. 2:21-cv-01160-JCM-VCF

**STIPULATION TO EXTEND
DEADLINE FOR RESPONSE TO
DEFENDANTS’ MOTION TO DISMISS
FIRST AMENDED COMPLAINT**

(First Request)

COME NOW Plaintiffs CIELO JEAN “CJ” GIBSON, EMMA GLOVER, JULIANNE KLAREN, LINA POSADA, MELANIE IGLESIAS, SANDRA VALENCIA, and VIDA GUERRA (collectively, “Plaintiffs”), by and through their counsel, and Defendants SHAC, LLC d/b/a SAPPHIRE GENTLEMEN’S CLUB; and SHAC MT. LLC (together, “SHAC Parties”), by and through their counsel, and hereby stipulate and agree as follows:

1. On June 17, 2021, Plaintiffs filed their Complaint (ECF No. 1);
2. On July 13, 2021, the SHAC Parties (through their counsel) executed Waivers of Service of Summons forms pursuant to Fed. R. Civ. P. 4(d) (ECF Nos. 5-6);
3. On November 12, 2021, Plaintiffs filed their First Amended Complaint (ECF No.

11), adding Evan Zappola d/b/a Vegas VIP King as an additional Defendant;

4. Plaintiffs are in the process of attempting service of the Summons and First Amended Complaint on Mr. Zappola;

5. On November 29, 2021, Plaintiffs and the SHAC Parties submitted, and this Court approved, a Stipulation to give the SHAC Parties additional time to respond to the First Amended Complaint (ECF Nos. 13-14);

6. On December 13, 2021, the SHAC Parties filed a Motion to Dismiss the First Amended Complaint (the "Motion to Dismiss") (ECF No. 15);

7. Due to scheduling conflicts for Plaintiffs' counsel and the upcoming Christmas and New Year's holidays, the time for Plaintiffs to respond to the SHAC Parties' Motion to Dismiss shall be extended from December 27, 2021 to January 17, 2022; and

8. This is the first stipulation for an extension of time for Plaintiffs to respond to the SHAC Parties' Motion to Dismiss, and is sought in good faith and not for the purposes of delay.

IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

DATED this 22nd day of December, 2021.

DATED this 22nd day of December, 2021.

ALVERSON TAYLOR & SANDERS

BAILEY ♦ KENNEDY

By: /s/ David M. Sexton
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IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: December 27, 2021